

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING
(PROPOSAL SEVEN)

Docket No. RM2021-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR
LEAVE TO FILE REPLY COMMENTS REGARDING PROPOSAL SEVEN
(March 12, 2021)

Order No. 5756 (November 18, 2020) established the procedural schedule in this proceeding and, while setting a date of February 26 for initial comments, made no provision for reply comments. Order No. 5835 (February 22, 2021) extended the initial comment deadline to March 5, 2021, but likewise made no provision for reply comments. Initial comments were filed by UPS (February 26, 2021), by the Public Representative, Pitney Bowes, and Amazon (March 5, 2021) and by PSA (March 8, 2021). Both the Public Representative and UPS support some aspects of Proposal Seven, but offer several criticisms and also seek alternative analytic procedures.¹ The Postal Service requests leave to file reply comments addressing the issues raised by UPS and the Public Representative.

Acceptance of those reply comments would enhance the Commission's ability to evaluate the criticisms of Proposal Seven advanced in the UPS and PR Comments, and thus create a more complete record for consideration of the Proposal. The Postal Service would otherwise have no opportunity to respond to the new material and proposals presented within those initial comments, or to correct the mistakes therein.

¹ In contrast, PSA, Amazon and Pitney Bowes all support adoption of Proposal Seven as submitted.

The Postal Service reply comments are proffered in a separate pleading submitted concurrently. Wherefore, the Postal Service respectfully requests leave to file reply comments responding to the initial comments filed in the proceeding by UPS and by the Public Representative.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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